

IDAHO PY24-27 WIOA COMBINED STATE PLAN WIOA TITLE I-B PLAN

I. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS - IDAHO

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

Adult, Dislocated Worker, and Youth Activities under Title I-B. *The Unified or Combined State Plan must include the following with respect to activities carried out under subtitle B—*

(a) General Requirements

(1) Regions and Local Workforce Development Areas.

(A) Identify the regions and the local workforce development areas designated in the State.

Idaho is identified as a single statewide planning region, consisting of the two former WIA local areas –

1. Balance of State and
2. East-Central District.

(B) Describe the process and policy used for designating local areas, including procedures for determining whether the local area met the criteria for “performed successfully” and “sustained fiscal integrity” in accordance with 106(b)(2) and (3) of WIOA. Describe the process used for identifying regions and planning regions under section 106(a) of WIOA. This must include a description of how the State consulted with the local boards and chief elected officials in identifying the regions.

The state’s policy criteria for local area designation and appointment of local board members have undergone several changes since WIOA’s inception. The table below shows the breakdown of this policy’s initial development, modification, and eventual approval by the state’s Workforce Development Council. The local area designation policy has remained the same since its 2022 revision.

Policy/ Modification	Action	Public Comment Period	Local Officials notified	Final Approval
Initial Policy	Presented to WDC in July 2015, later modified and approved by Governor	Posted from Aug-Sept. 2015. No comments received	County clerks & local mayors contacted via ID Assoc. of Cities; ID Assoc. of Counties	Approved by WDC on Oct. 2015.
Policy Modification	Reviewed by WDC early in 2020.	Posted March 2020. No comments received	See above	Approved by WDC on April 2020
Policy Modification	State staff revised to incorporate newly required changes imposed by USDOL.	Posted February 2022. No comments received	See above	Approved by WDC on June 2022.

The state's local areas have each met the policy criteria for "performed successfully" and "sustained fiscal integrity" as described below.

Performed Successfully- Met or exceeded the negotiated levels of performance for the last two consecutive program years and has not failed any individual measure during the same period.

Sustained Fiscal Integrity- The Secretary of Labor has not made a formal determination that either the grant recipient or the administrative entity of the area misspent funds due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration for the two-year period preceding the determination.

Local Area Designation and Policy

Region Identification and Policy (Currently being updated)

(C) Provide the appeals process and policy referred to in section 106(b)(5) of WIOA relating to designation of local areas.

Denial of Local Area Designation

A unit of general local government that requests but is not granted designation as a local Workforce Investment area under section 106 (b) (2) or (3) may submit an appeal to the State Workforce Development Council.

The existing designated workforce areas will continue while the appeal is in progress and will be modified should the initial denial of designation be overturned.

a. Appeal to the State Workforce Development Council

All such appeals shall be in writing and be filed within twenty (20) calendar days of the date the denial letter was mailed by the Governor or the Governor's designee. The appeal must include all factual and legal arguments as to why the appeal should be granted. The appeal shall be filed with the:

Executive Director of the Workforce Development Council
514 W. Jefferson Street, Ste. 131
Boise, Idaho 83702

The Executive Director shall promptly acknowledge receipt of the appeal.

The appeal shall be deemed timely filed if it is received by the Executive Director of the Workforce Development Council within the 20-day period, unless the appeal is filed by mail, in which case the official postmark affixed by the U. S. Postal Service shall be deemed to be the date of filing. Any appeal that is filed late shall be summarily dismissed.

The Chair of the Council will select a hearing officer. The appeal shall be heard by the hearing officer not more than forty-five (45) days after the appeal was filed. With the consent of the appealing party,

the hearing may be held after the 45-day period, but in no case shall the hearing be conducted more than sixty (60) days after the appeal was filed.

The hearing officer shall inform the appellant of the date, time, and place of the hearing by written notice mailed at least ten (10) calendar days in advance. The appellant shall have the right to present testimony and documentary evidence, to offer evidence in rebuttal, to present oral argument and to be represented by legal counsel. All testimony received by the hearing officer shall be under oath or affirmation. If the appellant retains legal counsel, federal WIOA funds cannot be used for remuneration.

An appellant must establish that it is entitled to designation as a local area according to this policy and WIOA.

Within fifteen (15) days of the hearing, the hearing officer shall issue a recommended decision, which shall include findings of fact, recommendations and the basis therefore. That decision shall be mailed to the appealing party. The hearing officer shall file a copy of the recommended decision with the Executive Director of the Council.

The recommended decision of the hearing officer shall be placed on the agenda of the next Council meeting for disposition, if there are at least 14 calendar days remaining prior to the meeting; however, if no Council meeting is scheduled within forty-five (45) days of the date the decision was issued, a special meeting of the Council, or a Committee designated by the Chair, shall be conducted within that 45-day period to accept, reject or modify the hearing officer's recommended decision.

In its deliberations, the Council shall consider only the evidence presented to the hearing officer. The Council shall not receive or consider any evidence not presented to the hearing officer. The decision of the Council shall be reduced to writing and be mailed to the Governor and the appealing party. The decision must set out in summary fashion the Council's findings and conclusions. The Council may adopt, in whole or in part, the findings of fact, recommendations and rationale of the hearing officer.

a. Appeal to U.S.DOL

If a timely appeal of the decision does not result in the requested designation, the unit of general local government or grant recipient may further appeal the designation decision to the U.S. Secretary of Labor within thirty (30) days after receipt of the Council's written decision. The appeal to the Secretary must be consistent with the requirements of the Workforce Innovation and Opportunity Act. The Secretary, after receiving a request for review and upon determining that the entity has met the burden of establishing that it was not accorded procedural rights under the appeal process established in the state plan, or that the area meets the requirements of Section 106(b) paragraph (2) or (3) and 20 CFR 679.250, as appropriate, may require that the area be designated as a local area. As part of this determination, the Secretary may consider comments submitted by the Council in response to the appeal.

Appeals made to the Secretary must be filed no later than 30 days after receipt of written notification of the denial from the Council, and must be submitted by certified mail, return receipt requested, to:

Secretary, U.S. Department of Labor
Attention: ASET
200 Constitution Ave NW
Washington, DC 20210

A copy of the appeal must also be simultaneously provided to the State Council, submitted to:

Workforce Development Council
514 W. Jefferson Street, Ste. 131
Boise, Idaho 83702

The Secretary will notify the Governor and the appellant in writing of the Secretary's decision.

(D) Provide the appeals process and policy referred to in section 121(h)(2)(E) of WIOA relating to determinations for infrastructure funding.

A One-Stop partner may appeal its portion of funds required for One-Stop infrastructure costs after determination by the Governor under the State infrastructure funding mechanism, consistent with §361.705(b).

The appeal must be made in writing to the Idaho Workforce Development Council within ten (10) business days of the Governor's determination. The appeal will be heard at the next Workforce Development Council meeting, provided there are at least 14 days before the next meeting. If the Council's regularly scheduled meeting is sooner than 14 days from the appeal submission, a special meeting of the Council, or a Committee designated by the Chair, shall be conducted within a 30-day period to accept or reject the appeal. The partner program entity shall have the opportunity to submit written and verbal information to the Workforce Development Council. The Council will issue a decision within 14 days of the Council appeal hearing. Its decision will be final.

Each partner may only appeal once per program year.

(2) Statewide Activities.

(A) Provide State policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities.

The Idaho Workforce Development Council, functioning as both Idaho's State and Local board, continually updates statewide and local operational policies for use by all WIOA service providers and they may be found on the Council's web site. Statewide policies for Governance, WIOA Title I-B, and One-Stop System reside on the Council's website via the following link - [Idaho WIOA Resources & Policies](#).

(B) Describe how the State intends to use Governor's set aside funding for mandatory and discretionary activities, including how the State will conduct evaluations of Title I Adult, Dislocated Worker, and Youth activities.

GOVERNOR'S FUND 15% SET-ASIDE PLANS

WIOA Title I-B funds reserved for state level activities will be used to support the following:

- Rapid Response activities for dislocated workers;
- Disseminating by various means:
 - The State list of eligible providers of training for adults, dislocated workers, and youth, including performance, tuition/fees, and attendance cost information;
 - Information identifying eligible providers of work-based training opportunities;
 - Information on effective outreach and partnerships with business and service delivery strategies and promising practices to serve workers and job seekers;
 - Information of physical/programmatic accessibility for individuals with disabilities;
- Conducting evaluations;
- Providing technical assistance to local areas in carrying out state plan activities, including coordination and alignment of data systems in support of this Act;
- Assisting various entities in providing opportunities for individuals with barriers to employment to enter in-demand industry sectors or occupations and nontraditional occupations, and the development of exemplary program activities.
- Assisting local areas in carrying out the regional planning and service delivery efforts;
- Assisting local areas by providing information on and support for the effective development, convening, and implementation of industry and sector partnerships;
- Providing technical assistance to local areas that fail to meet performance accountability measure;
- Carrying out monitoring and oversight of activities for services to youth, adults, and dislocated workers;
- Providing additional assistance to local areas that have a high concentration of eligible youth; and
- Operating a fiscal and management accountability information system.
- Supporting the state board as it implements workforce activities across the state.

Dissemination of Information

The State invests significant funds to meet this statutory requirement which includes eligible providers, outreach, service delivery strategies, accessibility, and workforce information. The state's

eligible training provider performance reporting system will continue to receive investments to support eligible training providers and comply with increased regulations.

Assisting in the Operation of the One Stop System

The State invests a significant amount of state funds to assist in the support and operation of the One Stop system. This also includes staff development and technical assistance. To ensure more local funds are dedicated to service delivery, state funds are used to supplement the local planning process and other administrative and program activities.

High-Concentration of Eligible Youth

The State reserved funds to serve high concentrations of eligible youth needing assistance throughout the state. Funds are distributed based on areas demonstrating a need for additional monies. From PY22 through PY23, these funds have since been directed to target services to justice-involved youth across the state.

Fiscal and Program Management

The State invests significant funds to pay for the costs of state administration and program functions such as monitoring, data validation and program assessments. This includes maintaining a fiscal reporting system as well as the annual subscription to America's Job Link for supporting the shared statewide MIS system and assisting with federal reports. The state's management information system, *IdahoWorks*, currently provides integrated participant, financial and management reporting for WIOA Title I-B programs, National Dislocated Worker Grants (NDWG), Wagner-Peyser activities, and TAA program activity. Tracking Rapid Response team activities are also noted in *IdahoWorks*.

Evaluations

The State implements evaluations to determine impacts upon the program when changes may potentially affect participation or performance outcomes. This past year, the state conducted an evaluation that sought to answer whether the change in the state's service delivery model affected individuals' potential enrollment in the WIOA Adult program. A summary of these results were included in the state's [PY22 WIOA Annual Narrative Report](#).

(C) Describe how the State will utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any layoff aversion strategies they have implemented to address at risk companies and workers.

The Idaho Department of Labor's Workforce Program Administration Bureau serves as the state Dislocated Worker Unit with responsibility for the coordination of Rapid Response/ Dislocated Worker/TAA services within the department and other state and local community resources. The department's Rapid Response funded activities involve and are closely coordinated with the Workforce Services Division, Benefits Bureau, Research and Analysis Bureau, Equus (the state's WIOA DW service provider), and American Job Center (AJC) locations. The department offers a comprehensive array of services including Title I-B, Wagner-Peyser, unemployment insurance, Trade Adjustment Assistance and veterans services.

Rapid Response interventions, implemented by the department's Workforce Programs Administration Division and coordinated with the local AJC locations, incorporate all these entities to ensure workers impacted by mass layoffs and closures are seamlessly transitioned to One-Stop activities. The department also coordinates with labor organizations in arranging services for dislocations involving organized labor. The East-Central Idaho Planning and Development Association, dba Altura Community Consulting, in eastern Idaho also plays a significant role coordinating that area's local resources to meet the workforce needs of impacted workers. These and other program representatives constitute the state's Rapid Response Team.

Local AJC management and Title I-B provider staff are responsible for coordinating local workforce investment activities in conjunction with the state's Rapid Response efforts, including making WIOA Title I-B resources available to dislocated workers. The staff assists the state in promoting rapid response, early interventions services, and helps to develop response plans to worker dislocations. AJC staff also assists in coordinating services with local economic development efforts and the appropriate local elected officials. The extensive involvement of both AJC management and frontline staff in each early stage of Rapid Response intervention ensures that affected workers are seamlessly transitioned to One-Stop activities.

Employers covered by the Worker Adjustment and Retraining Notification Act (WARN) must submit a notice of plant closures and mass layoffs to the Idaho Department of Labor, which in turn distributes the information to the department's administrators and state agencies participating in the One-Stop system. The Workforce Administration Bureau, local AJC management, or program staff will promptly initiate onsite contact with the employer and the appropriate employee representatives to implement the most effective re-employment activities including financial management, job search assistance and other workshops as requested. If appropriate, fully automated onsite re-employment centers may also be established and staffed. Career and training services are presented as viable options for the workers.

Promoting early intervention to worker dislocations allows the Rapid Response Team to develop the appropriate service delivery strategy for the impacted workers. The response takes into account the workers' skills through individual assessment, their potential for direct job placement and the availability of resources to address their short and long-term needs. Services include onsite information meetings on available employment and training programs, employee surveys, aggressive promotion of services and coordination with training providers.

Each year, the state sets aside a portion of the Title I Dislocated Worker funds, up to 25 percent, to support Rapid Response activities across the state. The funds are first prioritized for supplementing local WIOA Title I services and will support career and training services for the employees of the company. The second priority for funding is to support services for smaller dislocations where the Dislocated Worker Unit and local AJC staff agree that it is appropriate for the local area to take the lead in organizing the response. Funds are available for local areas lacking resources to meet the demand for services. The balance of Rapid Response funds not required to support the above activities is allocated to local Dislocated Worker providers to supplement their area formula-fund allocations.

These funds are allocated based on needs (support for carry-in participants and an increase in dislocations). Funds retained for Rapid Response activities at the state level may be allocated for an array of allowable business services, including layoff aversion and other workforce development services to employers to assist and prevent potential layoffs or closures.

The Rapid Response Team also reviews and evaluates the potential for layoff prevention services. The goal of these efforts is to retain the business and to minimize downsizing. If appropriate, the team will present local economic development programs to identify layoff prevention options. These efforts include determining appropriateness of requesting assistance from the state's Workforce Development Training Fund.

The Idaho Department of Labor has years of experience providing Rapid Response services to the Idaho employer community. Its proven track record is evident by its exemplary performance. Department and Rapid Response staff take every opportunity to promote the full range of business services at each contact independent of the reason for that contact. This brings a comprehensive range of economic development, workforce development and education services to the attention of the businesses the department serves. Companies view these services as positive, proactive, and business friendly.

The state's management Information system, *IdahoWorks*, currently provides integrated participant, financial and management reporting for WIOA Dislocated Worker, National Dislocated Worker Grants (NDWG) and TAA program activity. Tracking Rapid Response team activities are also noted in *IdahoWorks*.

(D) Describe the State policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities.

Idaho is a sparsely populated state covering a large geographic area, including millions of acres of federal land. Most natural disasters occur on federal land and displace few, if any, individuals, and businesses. The Bureau of Land Management coordinates responses for those events affecting federal land; its responses include hiring trained fire crews or utility workers.

For the occasion of a natural disaster requiring assistance from FEMA or other entities, the Idaho Office of Emergency Management is responsible to coordinate the responses of Idaho's state agencies. In the incident of an emergency, including natural disasters, the Idaho Office of Emergency Management (IOEM) activates an Idaho Emergency Operations Center (IDEOC). Depending on the level of emergency, various levels of service are provided to the community. At all levels, as appropriate, the Idaho Department of Labor participates in the agency coordination to ensure critical functions are operating and assistance is available to those in need. These functions include Rapid Response and Disaster Unemployment.

The Idaho Department of Labor's Workforce Programs Administration Bureau serves as the state Dislocated Worker Unit with responsibility for coordinating Rapid Response services around the state. In the event of an emergency requiring an Idaho Emergency Operations Center, the Idaho Rapid

Response Coordinator will ensure that a service delivery team is assembled in the affected area and coordinated with the IDEOC.

Idaho's team for Rapid Response service delivery consists of various program staff from the local American Job Centers offering the full-range of One-Stop services such as Employment Services, Unemployment Insurance, WIOA Title I-B Dislocated Worker, Trade Adjustment Assistance, and veterans services. The team may also include representatives from organized labor (if organized labor is affected) and East-Central Idaho Planning and Development Association when serving the East Central District (Service Delivery Area/Region 6).

The Rapid Response team is responsible for coordinating the local Rapid Response services and help develop a response plan for worker dislocations. The primary services provided by the Rapid Response team are WIOA Title I-B Dislocated Worker.

Disaster Unemployment is provided to individuals whose employment or self-employment has been lost or interrupted as a direct result of a major disaster. The program is activated in conjunction with a Presidential Declaration for Individual Assistance. After the FEMA declaration, state staff will prepare to submit a request for a National Dislocated Worker Emergency Grant within 15 days. After the initial provision of Rapid Response services under WIOA Title I, the state staff will consult the Rapid Response team for a recommendation to apply for a National Dislocated Worker Emergency Grant.

(E) Describe how the State provides early intervention (e.g., Rapid Response) and ensures the provision of appropriate career services to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed. (Section 134(a)(2)(A) and TAA Section 221(a)(2)(A) .) This description must include how the State disseminates benefit information to provide workers in the groups identified in the TAA petitions with an accurate understanding of the provision of TAA benefits and services in such a way that they are transparent to the dislocated worker applying for them (Trade Act Sec. 221(a)(2)(A) and Sec. 225; Governor-Secretary Agreement). Describe how the State will use funds that have been reserved for Rapid Response to provide services for every worker group that files a TAA petition and how the state will ensure the provision of appropriate career service to workers in the groups identified in the petition (TAA Sec. 221(a)(2)(A)).

WIOA Dislocated Worker and Trade Adjustment programs are both administered through the One-Stop centers. Since the inception of WIA and continued with WIOA, any means of cost sharing has been emphasized to increase the impact of limited funds. In Idaho, the state-level Rapid Response team includes staff from the dislocated worker, UI and TAA units. When notified of any closure or mass layoff, including those notifications received via Worker Adjustment and Retraining Notification (WARN), the team quickly broadens to include local delivery staff with expertise in provision of Rapid Response, Title I-B Dislocated Worker, UI, TAA and Wagner-Peyser services. This state-local team communicates with the employer and employee representatives, determines if the event is Trade related, assesses initial community impact, identifies, and includes other partners for rapid response assistance and develops integrated service delivery schedules to meet the needs of each individual

employer and the impacted workers. Delivery options of Rapid Response information are dependent upon on employers' and affected workers' needs. Rapid Response events may be held in-person and onsite, or via on-line media platforms such as Zoom or Teams meeting. The variation in the means of delivery makes for a more effective distribution of information, reaching more workers across a broad spectrum of (virtual) locations. Hard copy or electronic informational packets may be distributed to the impacted workers and may include a survey to determine workers' interests and to use towards the development of a National Dislocated Worker Grant. Team members work closely with service provider management staff to develop a service delivery plan that coordinates resources and ensures One-Stop access to information and enrollment in UI, TAA, WIOA and Wagner-Peyser, many times at the job site prior to dislocation and the filing of a Trade petition. Idaho's Rapid Response delivery system provides the impacted worker with coordinated application and enrollment for WIOA, TAA and Wagner-Peyser services. Career assessments conducted by WIOA staff are accepted for the TAA program, and vice versa, effectively eliminating client redundancies and streamlining co-enrollment processes. Like the federal program, the state requires co-enrollment of TAA recipients whenever the individual is WIOA-eligible and receives WIOA staff or other supportive services.

One-Stop TAA staff in Idaho have the background and experience to provide a comprehensive One-Stop assessment through their work with WIOA, ES, UI and TAA programs. Through the collection and analysis of participant information, staff can determine the best mix of services necessary for a TAA participant to obtain employment. Information areas may include an applicant's needs, strengths, support systems, education, job skills, interests and career objectives and current work search activities. Information may be gathered informally, via interviews or observations, or formally via assessment tools such as aptitude tests, computer assisted programs and interest inventories. Utilizing this information, these state-merit staff have the tools to guide participants in their work search and career development plans, which includes the option for occupational training through fulfillment of the required six criteria as allowed under TAA. Completing assessment activities for TAA participants eventually helps them "navigate" access to the appropriate One-Stop programs and services, as well as other community services.

(b) **Adult and Dislocated Worker Program Requirements.**

(1) Work-Based Training Models. *If the State is utilizing work-based training models (e.g. on-the-job training, incumbent worker training, transitional jobs, and customized training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State's strategies for how these models ensure high quality training for both the participant and the employer.*

On-the-job training (OJT) is training activity conducted by a private or public sector employer. This training occurs while the participant is engaged in productive work, learning the skills and information necessary for full and adequate performance on the job. OJTs are an attractive employer option for obtaining employees trained to their specifications, also helping the employees' acquisition of transferable skills to help them obtain employment later, should their current situation change. This effort also helps employers become more aware of the multitude of valuable resources offered by the state's One-Stop Centers. This activity allows businesses to rapidly adapt to changes in technology and the marketplace, making them capable of expanding and remaining competitive with affordable OJT

options uniquely designed to achieve their specific developmental goals, especially for small businesses looking to expand. The activity targets all individuals (Dislocated Workers, Adults, and Youth) who are eligible for services under WIOA (including discretionary grants) and may benefit from the availability of OJT options.

OJT Training contracts are directed at employers who can provide occupational skill training and full-time employment that leads to self-sufficiency for the participant. Employers must agree first to hire and then to train eligible WIOA/TAA participants. A training payment is provided to the employer to compensate for the extraordinary costs of training; extraordinary costs are those associated with workplace training and additional supervision. This includes those costs the employer has in training participants who may not yet have the knowledge or skills to obtain the job through an employer's normal recruitment process.

The state emphasizes and coordinates learning-rich, work-based opportunities such as on-the-job training as a method to:

- Connect employers to the future workforce
- Expose participants, including youth, to quality employment opportunities, real-world experiences and to the skills (both technical and non-) required for success on the job.

In addition, OJTs

- Improve the state's capacity to promote demand-driven services and build relationships with businesses;
- Increase employment opportunities for harder to serve individuals, such as the long term unemployed, older workers, and those with limited or sporadic job histories;
- Increase opportunities for the One-Stop system to enhance relationships with businesses;
- Increase percentages of employers hiring and retaining a skilled workforce;
- Increase number and percentages of workers trained and hired;
- Elevate skill proficiencies for workers that will result in increased worker viability;
- Increase responsiveness to labor market issues in the private sector; and
- Increase flexibility at the local level to offer businesses training solutions tailored to respond to the specific needs of the business.

Because of the State's reduced WIOA funding levels, its current policy does not include utilizing customized training, incumbent worker training, nor transitional jobs under WIOA.

(2) Registered Apprenticeship. Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., outreach to sponsors and prospective sponsors, identifying potential participants and connecting them to apprenticeship opportunities).

Idaho's apprenticeship development team, composed of workforce, apprenticeship, education, and other key partners, was formed in 2016 to support strategies to integrate apprenticeship into statewide workforce systems. The state's efforts towards advancing Registered Apprenticeship (RA) in Idaho have shown significant positive results since beginning a concerted effort to do so in 2015. The American Institutes for Research (AIR) and Social Policy Research Associates (SPR) have both recognized the state's significant efforts. Here is their joint statement acknowledging Idaho's work:

Idaho has shown a 116% increase in all apprentices, a 120% increase in new apprentices, and a 463% increase in new programs from 2015 to 2021. Under the State Apprenticeship Expansion Grant investments, Idaho has seen substantial performance on their grants with 452% of their target goal on their ASE grant and 72.67% of their SAEI grant (y-t-d). AIR and SPR have found through a state analysis that Idaho has developed innovations across three of the five expansion elements, including State Leadership and Policy; Outreach and Business Engagement; and Capacity to Develop, Register, and Support Programs.

The Idaho Department of Labor's (IDOL) Registered Apprenticeship Unit is the state's primary organization which develops, writes, and submits RA standards for registration with U.S.DOL-Office of Apprenticeship. IDOL's RA team guides sponsors through the Registered Apprenticeship Program (RAP) development process and serves as the only program providing technical assistance to sponsors through the sponsorship life-cycle and RAP expansion. Technical assistance offerings include Registered Apprenticeship Partners Information Database System (RAPIDS, for RA reporting), *IdahoWorks* (the state's workforce management information system), job postings, mentor training, and EEOC. Supporting these efforts are the internally developed resources such as the online Apprenticeship Idaho Sponsor Success Guide, online Apprentice Orientation Training System, and the innovative Sponsor Journey Map, a nationally recognized best practice by U.S.DOL/American Institutes for Research for state apprenticeship agencies which guides partners through the RAP development process.

Partnership and Alignment to Support Workforce System Integration

IDOL's alignment with the Apprenticeship Idaho Coalition and other key partners underscores our commitment to integrating apprenticeship with regional and statewide workforce development plans. This coalition facilitates training events and technical assistance, fostering growth and diversification of RAPs. Together with the state's Workforce Development Council, Idaho Division of Career Technical Education, AFL-CIO, Idaho Business for Education, Idaho Division of Vocational Rehabilitation, and Idaho Department of Corrections, the coalition connects across individual grants to support overall system expansion. Coalition leaders work collaboratively to achieve increased growth, development, modernization, and diversification of RAPs across Idaho. Meeting biweekly, the coalition hosts training and technical assistance events for employers, sponsors, and related-training instruction (RTI) providers across the state.

As recipients of several distinct apprenticeship grants, IDOL plans to continue the state's focus on innovating and modernizing its RAP systems through expansion and development of the following projects:

- **Increase Career Ladders** in the Most In-Demand Occupations in Need of Skilled Labor – Challenged with needing additional support in creating RAPs for the lowest skilled workers,

Apprenticeship Idaho plans to create pre-set and customizable career ladder/career lattice models to help employers with the most in-demand occupations.

- Develop a quality **framework for Pre-Apprenticeship Programs** leading to RAPs. – Research and design of a Pre-Apprenticeship Program, including curriculum development in areas of highest industry need, development a directory of Pre-Apprenticeship Programs and providers, and the potential development of a certification process.
- **Diversity, Equity, Inclusion & Accessibility** – A designated team placed strategically throughout the community, working alongside, and embedded within organizations and state agencies representing under-represented populations. The team will liaise with employers to expand RAP opportunities and create Individualized Resource Teams (IRTs) to facilitate talent pipeline connections and supportive wrap around services. Notable apprenticeship increases from FY22 to FY23 include:
 - Females – 221 to 425, a more than 92 percent increase over the year.
 - Hispanic/Latinos – 125 to 229, a more than 83 percent increase.
 - Vets – 56 to 103, a just under 84 percent increase, and
 - Persons with disabilities – 18 to 39, an over 116 percent increase over the previous year.
- **Public Sector Apprenticeships** – A team of public agency representatives dedicated to the development of Registered Apprenticeship programs across state agencies.
- “Ready to Grow” **RAPs with Online Customization System** – An online system will allow employers to choose the work process and RTI provider/outline per RAP, providing for customization when necessary.
- **Career Pathway Match-Making System** – This helps users create a pathway of existing options, from job shadowing, internship, pre-apprenticeship, and leading to RA within that career choice.
- **Third Party Credential Search** – A data system to house all apprentice certifications as they progress through related certifications, pre-apprenticeship, and RA certifications.
- **K-12 Awareness and National Apprenticeship Week curriculum** – A three-phased initiative to build awareness of apprenticeship as a viable career pathway begun in 2022, saw the successful completion of phases 1 and 2. Phase 1, entitled *Booper Dreams Big: An Almost True Story of Apprenticeship*, is a colorful children’s book about Booper the dog and his dream of having a career in space exploration. It was released during National Apprenticeship Week 2022 and continues to be distributed for free to elementary schools and libraries. For Phase 2, Apprenticeship Idaho partnered with the Idaho Digital Learning Alliance to contribute to the state mandated career planning coursework by collaborating on the creation of an apprenticeship module for the online course. Phase 3 of the initiative will be released in 2024 and targets 9-12 graders with social media activities to expand awareness and a dedicated

apprenticeship coordinator embedded in the Career Technical Education system to bring apprenticeship program employers and students together.

- Automate current **Talent Pipeline Referral System** to reduce lag time for apprentices qualified for inter-agency supportive services.
- **Unify Information Technology (IT) Systems** - Unify all state agencies working on RA projects under one single CRM system that monitors interactions with employers and allows partners to track the progress of RAPs throughout the development process. Integrating the current talent-pipeline referral system and providing more real-time follow-through with automated data triggering is also a proposed project outcome.
- **Apprenticeship Idaho Funding Committee** - Represents seven different funds that offer support to apprenticeship training programs and the committee members collaborate on referrals to provide maximum benefit available to sponsors.
- In partnership with the USDOL Women's Bureau, Apprenticeship Idaho hosted the state's first **Idaho Women in Transportation & Trades event**.

Idaho moved beyond a siloed approach and committed to integrating apprenticeship programs with business outreach and partner collaboration, thereby enhancing its workforce development system and supporting key industries. Through the cross training of workforce, education, community and business sectors, *Apprenticeship Idaho* partners serve to improve the state's RA capacity, with many individual and employer customers benefitting from this "tag-teaming" of resources, which spur its continued success.

(3) Training Provider Eligibility Procedure. Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs (WIOA Section 122).

Idaho's Policy for WIOA Eligible Training Providers Idaho Eligibility Criteria and Procedures underwent a policy revision to incorporate guidance from TEGL 08-19 and TEGL 08-19, Change 1 to ensure the state's compliance with federal mandates. The state's policy implements the ETP processes and requirements as laid out in this state plan. The revised policy is included below and outlines the process as it relates to the eligible training providers in Idaho. The updated policy shares these processes with the Idaho Launch program, the Workforce Development Council's state training program, to help WIOA staff and prospective customers in their training choice. This was done to ensure the maximum possibility of leveraging both resources to assist customers in achieving their training goal.

**Idaho Policy for
WIOA Eligible Training Providers
Idaho Eligibility Criteria and Procedures
Adopted December 13, 2023**

References:

- WIOA Section 122
- USDOL ETA Training and Employment Guidance Letter (TEGL) WIOA No. 03-18

- USDOL ETA Training and Employment Guidance Letter (TEGL) WIOA No. 08-19
- USDOL ETA Training and Employment Guidance Letter (TEGL) WIOA No. 08-19, Change 1
- 20 CFR §§ 680.400 – 680.530
- Idaho Policy for WIOA Eligible Training Providers Idaho Eligibility Criteria and Procedures, Adopted 04/07/2020
- 29 CFR 38.13

Introduction:

The Workforce Innovation and Opportunity Act (WIOA) requires states to approve training providers before funds can be used to pay for occupational skills training. The Governor (via the Idaho Workforce Development Council) is charged with developing the process for determining how training providers may qualify for inclusion on Idaho's Eligible Training Provider List (ETPL). The Idaho Department of Labor (as the State Administrative Entity under WIOA) implements this policy and maintains the ETPL.

This policy meets the requirements outlined in WIOA Section 122, TEGL 8-19, and 8-19, Change 1. The ETPL causes for denial, termination, and the appeals process are also outlined in this policy.

Eligible Training Providers and Programs of Study:

The WIOA statute and the Final Rule distinguish between eligible training providers (ETPs) and programs of study, as one ETP may provide multiple programs of study for a variety of occupations. Determining ETP eligibility is therefore a two-tier approach. First, the training provider must be an eligible entity to provide training, as listed in the Training Provider Criteria section later in this issuance. Second, the training program(s) offered by an approved training provider must meet eligibility and performance criteria delineated later in this document. For a training provider to receive WIOA Title I-B training funds for adults, dislocated workers, and out-of-school youth aged 16-24, the programs of study must be listed on the ETPL.

An ETP is a provider of training services who has met the eligibility requirements to receive WIOA Title I- B Adult or Dislocated Worker funds through the issuance of an individual training account (ITA) for the purpose of providing training services to eligible individuals. ITAs are also permissible for Out-of-School Youth aged 16 – 24, when appropriate. Each ETP's training programs are subject to the eligibility requirements in WIOA Section 122 and the regulations at 20 CFR part 680 Subpart F.

Eligible Providers of Training Services

WIOA 122(a)(2), 20 CFR 680.410, TEGL 08-19, TEGL 08-19 – Change 1

Subject to meeting federal and state eligibility criteria, WIOA eligible training providers must be one of the following entities:

- Institutions of higher education that provide a program that leads to a recognized postsecondary credential;
- Apprenticeship programs, including Registered Apprenticeship Programs (RAP), National Program RAPs, and Industry Recognized Apprenticeship Programs (IRAPs). See *Idaho Policy for WIOA Eligible Training Providers-Idaho Eligibility Criteria and Procedures*,

Training Program Criteria for more detail;

- Other public or private providers that provide training, which may include community-based organizations (CBOs) and joint labor-management organizations;
- Eligible providers of adult education and literacy activities under WIOA Title II if such activities are provided in combination with training services described in 20 CFR § 680.350; and
- Local boards if they meet the conditions of WIOA Section 107(g)(1).

Eligible Programs of Training Services

Adapted from 20 CFR 680.420

The Eligible Training Provider List is composed of approved eligible training programs. Both training providers and their individual programs must meet eligibility standards. A *program of training services* is defined as one or more courses or classes, or a structured regimen that directly leads to employment in an in-demand occupation. The training must lead to the following:

- An industry-recognized certificate or certification, a certificate of completion of a registered apprenticeship, a license recognized by the State involved or the Federal government, an associate or baccalaureate degree;
- Employment; or
- Measurable skill gains toward a credential described in the first bullet of this section or employment.

These training services may be delivered in person, online (virtual), or through a blended approach; however, the training provider must provide physical facilities and/or tools and equipment to provide a high-quality experience in meeting instructional and skills assessment needs.

Training Service Exceptions to Eligible Training Provider List

WIOA 122(h), 20 CFR 680.530, TEGL 08-19

Training services that are not subject to the requirements of the eligible training provider provisions in the *Idaho Policy for WIOA Eligible Training Providers - Idaho Eligibility Criteria and Procedures* are:

- On-the-job training; customized training; incumbent worker training; transitional employment; or
- The circumstances described at WIOA sec. 134(c)(3)(G)(ii), where the Workforce Development Council, as the WIOA local board, determines that:
 - There are insufficient providers, or
 - There is a training services program with demonstrated effectiveness offered in the local area by a community-based organization or other private organization to serve individuals with barriers to employment, or
 - It would be most appropriate to award a contract to an institution of higher education or other eligible providers of training services to facilitate the training of

multiple individuals in in-demand industry sectors or occupations, and such a contract does not limit customer choice.

- A WIOA enrollee may continue and complete their enrollment in a training program that was on the ETPL at the start of training but that has subsequently been removed from the ETPL unless there is a significant reason to cease participation (health, safety, criminal liability, etc.).

Note: The Eligible Training Provider List only provides occupational skills training services. Basic skills training, “soft” skills training, or other workforce preparation activities do not train individuals for a particular occupation. Additionally, the following are not considered occupational skills training:

- Workshops or seminars provided by organizations not registered with the Idaho State Board of Education that last three (3) calendar days or less and are offered no more than four (4) times per year are not considered occupational skills training
- Intensive review courses as instruction for test preparation
- Continuing education courses for those with existing occupational skills
- Short term certificates that are only one component of the typical requirements for a job, such as CPR, OSHA, WorkKeys, Food Handler Certificates, and basic computer training.

As part of a WIOA participant’s individualized employment plan, Idaho’s WIOA program may pay for these activities as career services separate from or in addition to occupational skills training.

Types of Eligibility

WIOA Sec. 122 (b)(4), TEGL 08-19

WIOA provides for *Initial Eligibility* and *Continued Eligibility*. Initial eligibility refers to new providers and/or programs that, upon approval, receive eligibility for one year. Continued Eligibility refers to a biennial review and renewal of programs that have completed initial eligibility.

New programs added to the ETP list are reviewed after a provisional year. Thereafter, States are required to review training provider eligibility every two years.

Policy criteria are provided below for both initial and continued eligibility as directed in TEGL 08-19’s Attachment III.

Criteria for WIOA Eligible Training Provider Initial Eligibility

Training Provider Criteria:

- Providers must have been providing training programs for at least one year to be eligible for placement on the ETPL. During the 12 months before eligibility, they must collect data to satisfy the requirements in the Training Program Criteria section. Once an entity has been operational for a minimum of 12 months, all other eligibility requirements apply. This does not apply to entities with established operations in other states that are

new to Idaho.

- Provide a certificate of registration from the Office of the State Board of Education or other oversight body, such as the Bureau of Occupational Licensing authorizing the entity to provide training and collect tuition in the State of Idaho. Organizations exempt from oversight do not qualify to be on the ETPL.
- Provide the required data elements in *IdahoWorks* as directed by the Idaho Department of Labor. This includes but is not limited to items such as reasonable accommodations, business partnerships, credential offerings, and debarment status.
- Training providers must submit three letters of recommendation from employers.
- Training providers must successfully complete the Equal Opportunity questionnaire located here: <https://www.labor.idaho.gov/WIOA/WIOA-EO-Desk-Survey.pdf>
- Training providers agree to send their students an Equal Employment Opportunity/customer satisfaction survey approved by the Idaho Department of Labor.
- Training providers must sign an agreement to securely collect and report required information for programs.
- Training providers must provide a current refund policy specifying when refunds for tuition and other costs associated with the training program will be allowed. Refund policies must be written and published so that students are aware of how to request a refund.
- Training providers must have a current grievance policy which provides for due process for students to file complaints with an organization against faculty, staff, or other institution employees. Grievance policies must be written and published so that students are aware of how to file a complaint.
- Training providers must assure their ability to provide training programs that are architecturally and programmatically accessible for individuals who are employed and individuals with barriers to employment, including individuals with disabilities (29 CFR 38.13). Every training provider that applies to be listed on the ETPL must sign a Training Provider Assurances (TPA) electronic form acknowledging adherence to WIOA requirements before receiving final approval to be added to the ETPL. The TPA electronic form indicates the training provider will comply with nondiscrimination and equal opportunity provisions of all applicable federal and state laws. If a training provider does not assure compliance with all applicable federal and state laws, they will not be able to complete the application for inclusion on the ETPL.

Training Program Criteria:

- The training program leads to an in-demand occupation. A brief definition of what constitutes these programs is listed in Appendix A. WIOA participants will be encouraged to select training for an occupation that pays no less than \$15 per hour.
Note: Appendix A is updated annually by the Workforce Development Policy Committee of the Idaho Workforce Development Council.
- The training program provides a high-quality experience, including a recognized postsecondary credential or demonstrating measurable skills gains toward such a credential or employment.
Note: WIOA participants will be encouraged to select high quality training that leads to an industry-recognized postsecondary credential, which is available at no cost or a low

cost to participants.

- High quality training experience is identified by:
 - Physical or virtual facilities with the appropriate tools or equipment to meet instructional and skills assessment needs;
 - Reportable skills gain measured by assessments;
 - Industry endorsement;
 - Not having a high dropout rate and/or high student loan default rate and/or poor job placement rate; and
 - Regional or national accreditation, if applicable.
- The training program is published in the provider's catalog of courses/programs and is available to all students (WIOA and Non-WIOA)
- The training program meets or exceeds a factor related to established WIOA performance outcomes:
 - Employment in the 2nd quarter after exit
 - Employment in the 4th quarter after exit
 - Median earnings in the 2nd quarter after exit
 - Credential attainment

Note: If the eligible training provider has not previously collected program data on the WIOA performance measures listed above, the state has identified alternative criteria that may be used to satisfy the initial performance requirement. Any of the following may be used:

- The training provider's general student retention, placement, or completion rates;
- The number of students who obtained employment;
- The number of students who obtained a credential or degree;
- A narrative that describes and quantifies how the training program improves students' employability and/or earning potential.

Exceptions:

Training programs exempt from the ETPL requirements include:

- On-the-job training, internships, and work experience activities.
- *Registered Apprenticeship Programs (RAPs)* – (TEGL 8-19 and TEGL 8-19, Change 1)
U.S. Department of Labor Registered Apprenticeship Programs with in-state sponsors and National Program RAPs that have operations in Idaho are automatically eligible for placement on the Idaho ETPL. USDOL considers RAPs to qualify as occupations in-demand in the local labor market. The state workforce development system conducts outreach across the state to apprenticeship-related entities through various means, incorporating partner involvement – the Idaho Department of Labor, the Workforce Development Council, and Idaho Business for Education, etc. – in efforts to inform RAPs and sponsors to help them understand the benefits of participating in the ETP process. It remains important and essential for Idaho to communicate the benefits of ETPL placement to current and new sponsors and make direct referrals to the ETP coordinator.

Upon request from the National RAP sponsor, RAPs will be placed on Idaho's ETPL. RAPs

are encouraged to comply with the requirements in this policy, especially providing information for performance reporting; however, they are not required to do so. National Program RAPs are not required to register the program with Apprenticeship Idaho.

RAPs will be added to the ETPL as soon as the request is made to the state with the information outlined in TEGL 8-19, Attachments II & IV – no minimum verification period will be required.

Note – Industry Recognized Apprenticeship Programs (IRAPs) **do not** receive the same ETP exceptions allowed for RAPs. Therefore, IRAPs seeking placement on the ETPL must follow the same process requirements as other training providers that are not RAPs, as described in this policy.

- *Postsecondary Academic Programs* – Academic programs provided by Idaho’s colleges and universities that are subject to Idaho State Board of Education oversight and meet in-demand occupation training needs (pursuant to Appendix A) will be approved for initial eligibility under WIOA. These programs will be added to the ETPL upon request of a WIOA career planner and confirmation by the Idaho State Board of Education.
- *Out-of-State Providers* – Approved ETPL providers and programs based in other states that do not have a physical presence in Idaho must be on their respective state’s WIOA ETPL. A reciprocal agreement must be signed with the respective state’s ETP administrator or appropriate signatory. The training provider will not be included on Idaho’s ETPL but will be considered on a case-by-case basis for individual participants if the program of study meets Idaho in-demand training needs (pursuant to Appendix A).

Note: Physical presence in Idaho is determined by an office location that is available for students to meet with staff in-person as required or requested.

Initial Eligibility Period:

A program’s initial eligibility will expire one (1) year from the date of approval.

Denial or Termination of Eligible Training Provider Status:

A training provider or program may be denied initial or continued eligibility or may be removed from participating in WIOA Title IB Programs outside of the annual review period for the following reasons:

1. Required information was not provided correctly or in a timely manner.
2. The training program does not support the occupations in demand in Idaho and/or does not meet minimum entry-level wage criteria.
3. The training program does not meet the WIOA definition of training services, which is a program of one or more courses or classes or a structured regimen that directly leads to employment in an in-demand occupation. The training must lead to the following:
 - Attainment of a recognized postsecondary credential,
 - Employment, or
 - Attainment of a measurable skill gain toward such a credential or employment.

4. The training program does not provide a high-quality educational experience in meeting instructional and assessment needs. This may be evidenced by lack of regional or national accreditation, lack of industry endorsement, lack of skills gain measured by assessments, lack of job placement, a high dropout rate, and/or high student loan default rate.
5. The training provider has not maintained the required licenses and certifications or is found non-compliant with the training provider's assurances or certifications.
6. The training provider does not comply with WIOA regulations, or any agreement executed under WIOA.
7. The training provider has demonstrated a lack of communication with WIOA participants, the service provider, or the state Administrative Entity, indicating little to no participant support.

Providers who apply for placement on the ETPL will be notified if they or their program(s) do not meet the compliance standards. Each provider will be notified of the status of each requested program.

Appeals Process:

A training provider whose program is denied placement on the ETPL or deemed ineligible may submit a written or email appeal to the Idaho Department of Labor within 14 business days of receiving notification. The request for appeal must include the following: name of training provider, training program(s) impacted, the reason for the appeal (i.e., grounds), training provider point of contact phone and email, and signature of training provider representative. Written appeals may be sent via:

Regular mail to:	Fax to:	Email to:
Appeals Bureau Idaho Department of Labor 317 W. Main Street Boise, ID 83705-0720	208-334-6440	WIOAETP@labor.idaho.gov

Regardless of delivery method, the appeal must be postmarked or sent by 5 pm on the last day to protest.

As a result of filing an appeal, a telephone hearing may be scheduled in which all interested parties will be invited to participate. The hearing shall include an opportunity for the applicant to submit written and verbal information to the hearing officer. This is the only opportunity a provider may have to appeal this issue. If no appeal is filed, this determination will become final and cannot be changed. Any questions about a determination or about filing an appeal should be directed to the ETP Coordinator by email at WIOAETP@labor.idaho.gov.

The hearing officer will issue a decision within 60 calendar days from the date the hearing takes place. The decision of the hearing officer shall be final. Those removed from or denied placement to the ETPL may re-apply for inclusion no earlier than one year after the decision has been made.

Criteria for WIOA Eligible Training Provider and Training Program Continued Eligibility

A training provider and their respective programs may have their eligibility continued by meeting the following criteria:

- Provide evidence that the Training Provider and program Criteria described in the Initial Eligibility section above continue to be met.
- Provider has updated and submitted the information and performance data as required by state and federal guidelines.
- The occupation(s) the provider's training program(s) are aligned with continue to be listed in the annually updated Appendix A.
- Provider demonstrates they have provided reasonable access to training services throughout the state including rural areas and through the use of technology.
- WIOA students have enrolled in programs within the most recently completed 12 months.
- Provider has delivered the EEO/Customer Satisfaction Survey to students and collected results. Provider has received an average satisfaction on returned surveys and is free from student/customer complaint based on survey results.
- As described in Initial Eligibility Requirements, the provider seeking continued eligibility must sign a new TPA form each year.

Programs exempt from Continued Eligibility criteria:

- US Department of Labor National Registered Apprenticeship Programs (RAPs) are not subject to Continued Eligibility criteria. They will continue to remain on the Eligible Training Provider list until the sponsor requests the program be removed, the program is deregistered, has been determined to have intentionally supplied false or inaccurate information, or has substantially violated a provision of Title I of WIOA or its regulations. RAPs will have their registration status verified at least every two years. RAPs are encouraged to comply with the requirements in this policy, especially providing information for performance reporting; however, they are not required to do so. RAPs must continue to provide ETA with the information outlined in TEGL 8- 19, Attachment IV.
- Postsecondary Academic Programs will be removed from the ETPL if the program no longer meets the in-demand occupation training needs (pursuant to Appendix A) and/or a WIOA participant has not been enrolled in the program during the most recently completed 12 months. These programs may be added back to the ETPL per the Initial Eligibility criteria.
- Out-of-State Providers and programs will be independently verified against their respective state's ETPL and current reciprocal agreements before WIOA ITAs may be issued.

Additional Guidance on Occupational Skills Training, Recognized Postsecondary Credential, and Measurable Skills Gain

Occupational Skills Training

20 CFR 681.540

Occupational skills training (OST) is defined as training conducted in a classroom or online

setting using curriculum designed to meet the technical needs of the workplace. Occupational skills training classes are categorized as training services under WIOA. The Eligible Training Provider List (ETPL) is developed to support customer choice for occupational skills training.

OST provides WIOA participants with the technical skills necessary to perform a specific job or group of jobs. The duration of OST activities varies based on many factors; however, the following considerations will be applied to each participant:

Basic Requirements

- Training is approved on the ETP list,
- Reasonable expectation of self-sufficient employment upon completion of training,
- The coursework can be completed in a reasonable time,
- The coursework is required for entry into a specific occupation,
- There are no other viable options for services or training that will lead the participant to self-sufficient employment, and
- Training costs are reasonable and may be covered by the WIOA service provider if finances allow.

Occupational skills training is provided through Individual Training Accounts. Individual Training Accounts (ITAs) provide traditional classroom or online training services to eligible participants through the Workforce Innovation and Opportunity Act (WIOA). Training services are available as funding permits and are reserved for eligible WIOA Title I Adult, Dislocated Workers (DW) and Out-of-School Youth participants. Eligible participants interested in training may access training services through Individual Training Accounts (ITAs) and Apprenticeship Training Accounts (ATAs) through training providers who have met eligibility requirements set by the state of Idaho.

Occupational Skills Training must lead to one or more of the following:

- a) Attainment of a recognized postsecondary credential; or
- b) Employment; or
- c) Measurable skills gain(s) toward a credential listed in the first bullet of this section or employment.

Recognized Postsecondary Credential

A postsecondary credential is a recognition of an individual's attainment of measurable technical or occupational skills necessary to obtain employment or advance within an occupation. A recognized postsecondary credential "means a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the state involved or federal government, or an associate or baccalaureate degree." Technical or occupational certificates awarded by workforce development boards (WDBs) and work readiness certificates are not included in this definition because neither type of certificate is recognized industry-wide nor documents the measurable technical or industry/occupational skills necessary to gain employment or advancement within an occupation. Likewise, such certificates must recognize technical or industry/occupational skills for the specific industry/occupation rather than general skills related to safety, hygiene, etc., even if such general skills certificates are broadly required to qualify for entry-level employment or advancement in employment.

A variety of different public and private entities issue recognized postsecondary credentials. Below is a list of the types of organizations and institutions that award recognized postsecondary credentials (not all credentials by these entities meet the definition of recognized postsecondary credential).

- A state educational agency or a state agency responsible for administering vocational and technical education within a state;
- An institution of higher education described in Section 102 of the Higher Education Act of 1965 (20 USC sec. 1002) that is qualified to participate in the student financial assistance programs authorized by Title IV of that Act. This includes community colleges, proprietary schools, and all other institutions of higher education that are eligible to participate in federal student financial aid programs;
- An institution of higher education formally controlled or has been formally sanctioned or chartered by the governing body of an Indian tribe or tribes.
- A professional, industry, or employer organization (e.g., National Institute for Automotive Service Excellence certification, National Institute for Metalworking Skills, Inc., Machining Level I credential) or product manufacturer or developer (e.g., recognized Microsoft Information Technology certificates, such as Microsoft Certified IT Professional (MCITP), Certified Novell Engineer, a Sun Certified Java Programmer, etc.) using a valid and reliable assessment of an individual's knowledge, skills, and abilities;
- ETA's Office of Apprenticeship or a recognized state apprenticeship agency;
- A public regulatory agency that awards a credential upon an individual's fulfillment of educational, work experience, or skill requirements that are legally necessary for an individual to use an occupational or professional title or to practice an occupation or profession (e.g., Federal Aviation Administration aviation mechanic license, or a state-licensed asbestos inspector);
- A program that the Department of Veterans Affairs has approved to offer education benefits to veterans and other eligible persons; or
- Job Corps issues certificates for completing career training programs based on industry skills standards and certification requirements.

Types of Acceptable Credentials in the State of Idaho:

The following are acceptable types of credentials that count toward the credential attainment indicator:

- Secondary school diploma or recognized equivalent
- Associate degree
- Bachelor's degree
- Graduate degree for purposes of the Vocational Rehabilitation program
- Occupational licensure
- Occupational certificate, including Registered Apprenticeship and Career & Technical Education educational certificates
 - This includes the certificates awarded under the postsecondary affairs section of the Idaho State Board of Education Governing Policies and Procedures (Section III.E.)
- Occupational certification
 - This includes any licenses/registries required under the Idaho Code. A current list

can be found at <http://www.idaho.gov/business/professional-licenses/>

- Other recognized certificates of industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment.
 - This includes [SkillStack badges](#) awarded by eligible educational institutions as approved by Idaho Career & Technical Education. The badge(s) must be aligned to an in-demand occupation.

Measurable Skills Gain

Measurable skills gain is defined as documented academic, technical, occupational, or other forms of progress toward a credential or employment. Depending upon the type of education or training program, below are the five (5) types of MSG and the supporting documentation that may be used to demonstrate a skills gain.

- Documented achievement of at least one educational functioning level of a participant who is receiving instruction below the postsecondary education level;
- Documented attainment of a secondary school diploma or its recognized equivalent;
- Secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a participant is meeting the state unit's academic standards;
- Satisfactory or better progress report towards established milestones from an employer or training provider who is providing training, such as completion of OJT or completion of 1 year of an apprenticeship program or similar milestones; or
- Successful passage of an exam required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as knowledge- based exams.

Examples:

- A participant has enrolled in a 4-year registered apprenticeship program: the measurable skill gains indicator tracks the skills the participant gains throughout the reporting period, not just at the end of the 4-year training program.
- For low-skilled adult participants of an adult education program, the measurable skill gains indicator provides an opportunity to track and report gains in reading, writing, mathematics, and English proficiency.

APPENDIX A

WIOA Eligible Training Providers and Idaho LAUNCH In-Demand Occupation & Training Program Alignment Methodology

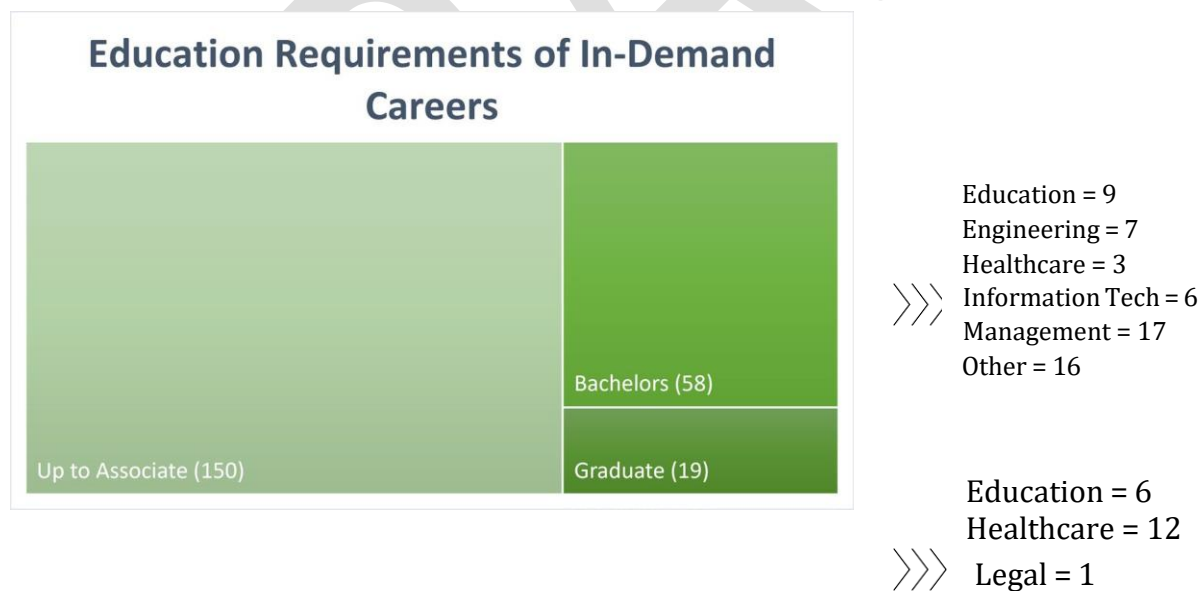
Determining which Occupations are In-Demand

Data is provided by Idaho Department of Labor (IDOL) from the Long Term Occupational and Industry Projections which are updated every two years under contract with the Bureau of Labor Statistics.

Long-term employment projections cover a 10-year time span and are available for both industries and occupations. The rise and fall of the business cycle is factored out in the long-term projection process in order to highlight growth and contraction of industry employment as well as changing staffing patterns within industries. <https://lmi.idaho.gov/data-tools/occupational-industry-projections/>

The Workforce Development Council applies the following methodology:

1. "Rolled-up" SOCs (Standard Occupational Classification codes) are removed from IDOL file (i.e. xx-xx00).
2. Occupations are sorted in descending order by Annual Openings.
3. SOCs with fewer than 50 annual openings were excluded. This leaves 296 occupations.
4. For the purpose of matching to training programs, occupations that do not require formal training¹ are removed. This leaves 227 occupations.



Aligning the in-demand occupations to the programs eligible for LAUNCH

The final list of in-demand occupations is mapped to the list of programs offered by Idaho institutions and training providers using the 2020 CIP to SOC Crosswalk (CIP = Classification of Instructional Programs):

The CIP SOC Crosswalk is a joint effort by the Bureau of Labor Statistics and the National Center for Education Statistics and matches 6-digit CIP Codes from the 2020 Classification of Instructional Programs (CIP) with 6-digit detailed descriptions from the 2018 Standard Occupational Classification (SOC). The purpose of the crosswalk is to match postsecondary programs of study that provide graduates with specific skills and knowledge to occupations requiring those skills or knowledge to be successful. <https://nces.ed.gov/ipeds/cipcode/post3.aspx?y=56>

The Workforce Development Council applies the following methodology:

1. The In-Demand Occupation list is adapted for 24 SOC codes where the Idaho Department of Labor is using a 2010 SOC code. This addresses a few occupations where Idaho's data isn't sufficient to analyze occupations that have been "split" into smaller groupings at the federal level. One example is the 2010 SOC of 29-2040 for Emergency Medical Technicians and Paramedics. The 2018 SOC updates this to 29-2042 Emergency Medical Technicians and 29-2043 Paramedics.
2. Program CIP Codes are collected from institutions. Smaller workforce training providers (who do not have familiarity with CIP codes) are assigned a CIP code by WDC staff.
3. WDC staff "standardize" the following programs to the associated CIP. This addresses many healthcare and science programs that prepare individuals either for ongoing postsecondary education or employment at a "technician" level. It also ensures that programs that would be available for legal careers are limited only to those that are direct pathways:

CIP	Program	CIP	Program
26.0101	Pre- Medicine	51.0203	Pre-Speech Pathologist
26.0101	Pre-Nursing	51.0204	Pre-Audiologist
26.0101	Pre-Dental	51.2308	Pre-Physical Therapist
26.0101	Pre-Occupational Therapist	51.1701	Pre-Optometry
26.0101	Pre-Pharmacy	51.0999	Pre-Medical Technology
26.0701	Pre-Vet	15.0000	Pre-Engineering
51.1501	Pre-Counseling	03.0501/0510/ 0511/0599	Pre-Forestry (CIP depends on specialty area)
51.0101	Pre-Chiropractic		
51.0602	Pre-Dental Hygiene	03.0301	Pre-Fisheries
51.3101	Pre-Dietetics or Nutrition	43.0107	Law Enforcement
26.0908	Pre-Kinesiology	43.0104	Pre-Law

4. To address broad program offerings being aligned to teaching occupations (i.e. general degrees in history, languages, and other majors that don't result in a teaching certificate), all CIP codes that do not directly link to a teaching certificate are removed from the CIP to SOC crosswalk.
5. WDC Staff are continuing to refine and align the CIP codes provided by institutions and will be assigning a LAUNCH CIP code for use in 2024. When institutions do not use consistent

CIP codes for the same program (ex. accounting), it causes discrepancies in the tools being used to guide students towards in-demand careers. The Career Cards on Next Steps Idaho show all the available in-demand careers; however, the match to available programs was not complete due to these inconsistencies. For the current application cycle, this had to be addressed by posting a static list of programs on the Department of Labor's website in conjunction with the list of in-demand careers.

¹ The Bureau of Labor Statistics assigns a "Typical Education Requirement" to each SOC. In a few instances, the CIP to SOC Crosswalk disagrees, as training is available for that occupation. The WDC considers both sources in determining which occupations require formal training.

(4) Describe how the State will implement and monitor for the Adult Priority of Service requirement in WIOA section 134 (c)(3)(E) that requires American Job Center staff, when using WIOA Adult program funds to provide individualized career services and training services, to give priority of service to recipients of public assistance, low-income individuals, and individuals who are basic skills deficient (including English language learners).

Idaho's Integrated WIOA Priority of Service Policy includes the specific program requirements for the Adult program. The excerpt for adult priority of service for individualized career and training services follows:

Priority Groups

1. Veterans and eligible spouses receive priority service for all Department of Labor-funded training programs, including WIOA programs.
2. Individuals receiving public assistance, other low-income adults, and individuals who are basic skills deficient have statutory priority service for individualized career and training services under the Adult program.

Order for Priority of Service for Individualized Career Services and Training Services

1. Veterans and eligible spouses who are recipients of public assistance, low income, or basic skills deficient.
2. Other individuals who are recipients of public assistance, low income, or basic skills deficient.
3. Veterans and eligible spouses who are not recipients of public assistance, low income, or basic skills deficient.
4. Other individuals who are not recipients of public assistance, low income, or basic skills deficient, but have a potential barrier to employment as defined by WIOA:
 - a. Displaced Homemakers
 - b. English Language Learners, Low Levels of Literacy, Cultural Barriers
 - c. Exhausting TANF within 2 years
 - d. Ex-offenders/justice-involved

- e. Homeless individuals/runaway youth
 - f. Long-term unemployed (unemployed 27 weeks or longer)
 - g. Migrant and Seasonal Farmworkers
 - h. Persons with Disabilities (including youth)
 - i. Single Parents (Including single pregnant women)
 - j. Youth in foster care or aged out of system
 - k. Individuals within an under-represented demographic, such as sex, race, or ethnicity; (Native Americans/Indians, Alaska Natives, Native Hawaiian, African-American, Latino/Hispanic, etc.)
5. Other individuals within these recognized groups:
- a. Individuals referred by other One-Stop partner programs.
 - b. Individuals residing in rural counties.
6. Any other eligible individual determined to be appropriate for services or training to obtain or retain employment.

Low Income Eligibility:

Idaho uses 70% Lower-Level Standard Income Level to determine eligibility for low income WIOA participants under WIOA §(3)(35)(ii).

Monitoring Adult Program Priority

The administrative entity collects quarterly data to ensure program and state compliance for WIOA priority of service of Title I-B enrollments.

(5) Describe the State's criteria regarding local area transfer of funds between the adult and dislocated worker programs.

Local workforce areas, with the approval of the Governor, may transfer up to 100 percent of the Adult Activities funds for expenditure on Dislocated Worker Activities, and up to 100 percent of Dislocated Worker Activities funds for expenditure on Adult Activities.

The WDC reserves the right to adjust the funds distributed to Service Delivery Areas, within a single Local Area, in or around December and March of each program year. Adjustments will be made based on an SDA's enrollment and expenditure levels compared to the planned levels within their annual agreement. Enrollment or expenditures 10 percent under planned levels will trigger the WDC to consider adjustments. The WDC will consult with the Administrative Entity and service provider to address participant needs and prevent underspending before shifting funds.

(6) Describe the State's policy on WIOA and TAA co-enrollment and whether and how often this policy is disseminated to the local workforce development boards and required One-Stop partners Trade Act Sec. 239(f), Sec. 235, 20 CFR 618.325, 20 CFR 618.824(a)(3)(i).

Co-enrollment with the WIOA Dislocated Worker program is required for all TAA and RTAA/ATAA participants approved for any one or a combination of the following Trade Act services: employment and case management, training, job search allowance, relocation allowances, and wage subsidy for older workers (RTAA/ATAA). A worker enrolled in TAA and/or RTAA/ATAA is eligible for enrollment in the WIOA Dislocated Worker program regardless of when the TAA qualifying layoff took place, (20 CFR 618.325 (a)(1)). This means there is no time limit from when the trade affected employment ended until the DW co-enrollment with the TAA program takes place. The only exception for not co-enrolling with the WIOA DW program is if the DW participant does not meet Selective Service registration requirements. The state provides program and partner staff with a list of allowable dislocated worker documentation and guidance on the selective service verification requirement.

Idaho's policy **only** applies to individuals co-enrolled in the DW and TAA programs. All other individuals must follow the state WIOA Dislocated Worker eligibility policy. The state provides monthly calls with providers and partner programs to review various topics, including policies. Approved by the state One-Stop Committee and shared with the Workforce Development Council, the state Administrative Entity has presented the policy during the provider calls as well as during other trainings throughout the year.

(7) Describe the State's formal strategy to ensure that WIOA and TAA co-enrolled participants receive necessary funded benefits and services. Trade Act Sec. 239(f), Sec. 235, 20 CFR 618.816(c)

WIOA Dislocated Worker and Trade Adjustment programs are both administered through the One-Stop centers. Since the inception of WIA and continued with WIOA, any means of cost sharing has been emphasized to increase the impact of limited funds. In Idaho, the state-level Rapid Response team includes staff from the dislocated worker, UI and TAA units. When notified of any closure or mass layoff, including those notifications received via Worker Adjustment and Retraining Notification (WARN), the team quickly broadens to include local delivery staff with expertise in provision of Rapid Response, Title I-B Dislocated Worker, UI, TAA and Wagner-Peyser services. This state-local team communicates with the employer and employee representatives, determines if the event is Trade related, assesses initial community impact, identifies, and includes other partners for rapid response assistance and develops integrated service delivery schedules to meet the needs of each individual employer and the impacted workers. Delivery options of Rapid Response information are dependent upon on employers' and affected workers' needs. Rapid Response events may be held in-person and onsite, or via on-line media platforms such as Zoom or Teams meeting. The variation in the means of delivery makes for a more effective distribution of information, reaching more workers across a broad spectrum of (virtual) locations.

Hard copy or electronic informational packets may be distributed to the impacted workers and may include a survey to determine workers' interests to use towards the development of a National Dislocated Worker Grant. Team members work closely with service provider management staff to develop a service delivery plan that coordinates resources and ensures One-Stop access to information and enrollment in UI, TAA, WIOA and Wagner-Peyser, many times at the job site prior to dislocation and the filing of a Trade petition. Idaho's Rapid Response delivery system provides the impacted worker with coordinated application and enrollment for WIOA,

TAA and Wagner-Peyser services. Career assessments conducted by WIOA staff are accepted for the TAA program, and vice versa, effectively eliminating client redundancies and streamlining co-enrollment processes. Like the federal program, the state requires co-enrollment of TAA recipients whenever the individual is WIOA-eligible and receives WIOA staff or other supportive services.

(8) Describe the State's process for familiarizing One-Stop staff with the TAA program. 20 CFR 618.804(j), 20 CFR 618.305

One-Stop staff in Idaho have the background and experience to provide a comprehensive One-Stop assessment through their work with WIOA, ES, UI and TAA programs. Through the collection and analysis of participant information, staff can determine the best mix of services necessary for a TAA participant to obtain employment. Information areas may include an applicant's needs, strengths, support systems, education, job skills, interests and career objectives and current work search activities. Information may be gathered informally, via interviews or observations, or formally via assessment tools such as aptitude tests, computer assisted programs and interest inventories. Utilizing this information, these state-merit staff have the tools to guide participants in their work search and career development plans, which includes the option for occupational training through fulfillment of the required six criteria as allowed under TAA. Completing assessment activities for TAA participants eventually helps them "navigate" access to the appropriate One-Stop programs and services, as well as other community services.

(a) **Youth Program Requirements.** *With respect to youth workforce investment activities authorized in section 129 of WIOA, States should describe their strategies that will support the implementation of youth activities under WIOA. State's must-*

(1) *Identify the State-developed criteria to be used by local boards in awarding grants or contracts for youth workforce investment activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA.¹ Further, include a description of how the State assists local areas in determining whether to contract for services or to provide some or all of the program elements directly.*

As allowed in WIOA §681.400, the Idaho Department of Labor, as the state's grant recipient/fiscal agent, has exercised its option to provide youth workforce investment activities. All intake, assessment, completion of individual service strategies, case management, and follow-up services are provided within the One-Stop offices by Idaho Department of Labor staff and is supported by the Workforce Development Council in its role as the state's local board.

Outcomes

Compliance with federal performance guidelines, which provide specific levels of performance for WIOA program outcomes, is critical. Performance indicators may be added or revised to meet federal and state requirements.

¹ Sec. 102(b)(2)(D)(i)(V)

- a. Percentage of participants who are in education or training activities, or in unsubsidized employment, during the second quarter after exit from the project.
- b. Percentage of participants in education or training activities, or in unsubsidized employment, during the fourth quarter after exit from the project.
- c. Median earnings of participants who are in unsubsidized employment during the second quarter after exit from the project.
- d. Percentage of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent during participation in or within 1 year after exit from the program.
- e. Percentage of program participants in an education or training program that led to a recognized postsecondary credential or employment and achieved a measurable skill gain, noting progress towards such a credential or employment.
- d. Effectiveness in serving employers.

(2) *Explain how the State assists local workforce boards in achieving equitable results for out-of-school and in-school youth. Describe promising practices or partnership models that local areas are implementing and the state's role in supporting and scaling those models within the state for both in-school and out-of-school youth.*

Connecting with Youth remains a major emphasis among the State's Combined State Plan partners. Despite the economy's resurgence since the peak of the pandemic, young people, as a broad group, still appear at a disadvantage in terms of finding employment. This disadvantage is compounded when applied to persons with additional barriers to employment such as being an out-of-school youth.

Since PY2016, the state's Title I Youth program has directed 100% of program funds towards out-of-school youth. However, in 2021, the Idaho Workforce Development Council revised its policy directing program funding. It continues to direct 100% of Youth program funds towards serving out of-school Youth; but it allows for an exception of Council-approved special projects. These approved special projects may include in-school-youth, utilizing program and/or recaptured funds. All program and special project expenditures will adhere to the 75% minimum for OSY unless the state receives a waiver from USDOL to increase the percentage for ISY.

With this policy in place, the council allowed the six Service Delivery Areas across the state to enroll in-school youth in their individual Summer Youth Work Experience projects designed to boost youth employment opportunities. The project ran from the last quarter of PY21 through the end of PY22's first quarter. WIOA Youth program staff underwent training on how to work with in-school youth so as not to miss any opportunities to serve youth who may benefit from this project. WIOA-eligible in-school youth were only allowed to participate in this project – the state's emphasis on serving out-of-school youth was not altered with this slight modification. Approximately five percent of project participants were in-school youth.

A workforce goal identified by the Idaho Workforce Development Council (Section 11(b)(2)(A)) is "Improve the effectiveness, quality, and coordination of programs and services designed to maintain a highly skilled workforce." Beneath this goal are several strategies specifically designed to target the improvement of out-of-school youth outcomes, including:

- A) Create, align, and sustain partnerships with stakeholders to implement workforce development programs.
- B) Support development in work-based learning, and innovative programs to drive Idaho's present and future workforce solutions.
- C) Leverage existing local employer-focused initiatives to build and support effective pathways to connect Idahoans to careers.
- D) Cultivate a high-quality One-Stop Career System that connects employers and workers and facilitates access to workforce services, education services, and information.

Out-of-school and disconnected youth specifically benefit from expanded alternative learning modalities and training opportunities developed within Idaho's education and workforce systems. These may include work-based learning, apprenticeships, distance education, and compressed scheduling. The state's Title II programs connect participants, including those age 16-24, to career pathways through contextualized education in reading, writing, math, and the English language, as well as integrated education and training, and transition into training by utilizing the previously noted modalities. This strategy will improve outcomes for out-of-school youth who may not benefit from or have access to traditional modes of education.

The State workforce partners are enacting more focused efforts around specific youth with barriers, including out-of-school youth, youth with disabilities, and low-skilled youth. The Workforce Development Council has identified the following groups with barriers to employment to receive priority service under the WIOA Title I Youth program for out-of-school youth:

- low-income youth involved with the juvenile justice system;
- low-income youth exiting foster care;
- low-income youth that are pregnant and/or parenting; and
- low-income youth with disabilities.

The alignment of WIOA core programs to maximize service through limited resources continues to improve outcomes for both in-school and out-of-school youth throughout the state. In addition, the Workforce Development Council has continued the efforts with the state's implementation of an incentives policy to encourage overall participant achievement, especially for youth. The council reviewed and updated its policy, allowing the Idaho Department of Labor to determine the additional incentives necessary to incorporate as part of the state's offerings to improve program outcomes. As the state administrative entity, the department has the insight to assess not only the feasibility of the incentives, but also their potential success. After an in-depth review of multiple options, the department finalized the policy which is posted [here](#).

(3) *Describe how the State assists local workforce boards in implementing innovative models for delivering youth workforce investment activities, including effective ways local workforce boards can make available the 14 program elements described in WIOA section 129(c)(2); and explain how local areas can ensure work experience, including quality pre-apprenticeship and registered apprenticeship, is prioritized as a key element within a broader career pathways strategy.*

The Idaho Department of Labor has been designated as the state's comprehensive WIOA Youth program service provider as allowed under the provisions of the Workforce Innovation and Opportunity Act's Final Rule at 681.400. This section clarified that the competitive procurement provision discussed in the Act (Sec. 123) is only applicable if the local board (please note, Idaho's Workforce Development Council functions as both a state and local board) chooses to award grants or contracts to youth program element service providers other than the grant recipient/fiscal agent.

As the grant recipient, the Idaho Department of Labor is not only eligible to provide service elements under this provision, but also eligible to provide the design framework component of the youth program. The design framework includes intake, assessment, development of an individual's service plan and overall case management - these will determine whether occupational skills are required by the youth, negating the need for procuring the element. In Idaho, the grant recipient/fiscal agent -the Idaho Department of Labor - will provide youth design framework services.

Extensive surveys and communication with youth service providers found that the WIOA youth elements found to be commonly available in local service areas for youth tutoring, alternative school, education concurrent w/work prep, guidance and counseling, financial literacy education, entrepreneurial skills, labor market information and transition activities will be *coordinated* with other providers in the communities, rather than purchased with WIOA funds.

As the comprehensive youth program provider, the Idaho Department of Labor Workforce Division staff provide both the design framework and element services. Its career planners provide access and/or referral to any of the elements most appropriate for the eligible youth. The Idaho Department of Labor service providers require a program design which includes the 14 required youth elements with an emphasis on the following:

- activities leading to the attainment of a secondary school diploma or its recognized equivalent, or a recognized postsecondary credential;
- preparation for postsecondary educational and training opportunities;
- strong linkages between academic instruction and occupational education that lead to the attainment of recognized postsecondary credentials; and
- preparation for unsubsidized employment opportunities (which includes access to apprenticeship prospects and multiple options for work experience) ; and

- effective connections to employers, in in-demand industry sectors and occupations of the local and regional labor markets.

To ensure the framework services are effectively implemented, the Idaho Department of Labor has established expectations for objective assessments, individual service strategy and other career planning and follow-up services for youth.

To ensure that youth receive the elements found to be commonly available in local service areas, the providers have developed linkages with the public, private and non-profit service providers of these elements. These linkages include arrangements which ensures a regular exchange of information relating to the progress, problems and needs of participants.

Performance of these service providers are monitored regularly to ensure program integrity, including their progress toward the achievement of goals, objectives, expenditure rates, service levels, and other process and outcome measures.

(4) Provide the language contained in the State policy for “requiring additional assistance to enter or complete an educational program, or to secure and hold employment” criterion for out-of-school youth specified in WIOA section 129(a)(1)(B)(iii)(VIII) and for “requiring additional assistance to complete an education program, or to secure and hold employment” criterion for in-school youth specified in WIOA section 129(a)(1)(C)(iv)(VII). If the state does not have a policy, describe how the state will ensure that local areas will have a policy for these criteria.

The state Workforce Development Council approved the following criteria for youth requiring additional assistance, which was initially recommended by the state’s Youth Subcommittee.

The WIOA Definition for Youth Needing Additional Assistance (Out-of-school Youth):

Low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment:

- A) Has been treated by a professional for mental health issues including traumatic events, depression, or substance abuse related problems. OR
- B) Has been or is a victim of abuse, or resides in an abusive environment as documented by a licensed professional; OR
- C) Has been unemployed for at least three of the last six months (not necessarily consecutive); OR
- D) Has a family history of chronic unemployment (during the two years prior to application, family members were unemployed longer than employed); OR
- E) Limited English speaking or cultural displacement. i.e., refugees.

(d) Single-area State requirements. *In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information required in the local plan (WIOA section 106(d)(2)). States with a single workforce area must include—*

(1) Any comments from the public comment period that represent disagreement with the Plan. (WIOA section 108(d)(3).)

Any public comments will be included in the Appendices.

(2) The entity responsible for the disbursement of grant funds, as determined by the governor, if different from that for the State. (WIOA section 108(b)(15).)

Not applicable. The Idaho Department of Labor is the entity responsible for the disbursement of grant funds.

(3) A description of the type and availability of WIOA title I Youth activities and successful models, including for youth with disabilities. (WIOA section 108(b)(9).)

Extensive surveys and communication with youth service providers found that the WIOA youth elements found to be commonly available in local service areas for youth tutoring, alternative school, education concurrent w/work prep, guidance and counseling, financial literacy education, entrepreneurial skills, labor market information and transition activities will be coordinated with other providers in the communities, rather than purchased with WIOA funds. Also, WIOA and its regulations clarify that awarding a grant on a competitive basis does not apply to the design framework component where these services are provided by the grant recipient/fiscal agent. The design framework includes intake, assessment, development of an individual's service plan and overall case management. These will determine whether occupational skills are required by the youth, negating the need for procuring the element. In Idaho, the grant recipient/fiscal agent -the Idaho Department of Labor - will provide youth design framework services.

The remaining youth elements - paid/unpaid work experiences, leadership skills, supportive services, and adult mentoring - are also provided through the Idaho Department of Labor, since it has exercised its option to provide youth workforce investment activities as the grant recipient, as noted in the response to item (C)(1) earlier in this narrative.

Youth with disabilities are a priority group for the WIOA Title I Youth program. The state has made significant efforts to ensure that services to youth with disabilities are provided in the same capacity as those without disabilities and the needs of this population are properly addressed. Many of the WIOA Youth program staff were trained under a Disability Employment Initiative grant for service provision to the targeted youth. Most WIOA partner staff providing services to employers develop key relationships with businesses to provide opportunities for work-based activities for youth with disabilities. Strong partnerships with the Idaho Division of Vocational Rehabilitation, Idaho Commission for the Blind and Visually Impaired and Idaho Educational Services for the Deaf and the Blind are utilized to develop and undertake activities as diverse as Ropes courses for teamwork and

leadership development to week-long work readiness camps that help these youth achieve success by building their confidence, self-esteem and job seeking skills.

(4) *A description of the roles and resource contributions of the One-Stop partners.*

The requirements for infrastructure cost sharing contributions are applicable to WIOA local areas. Idaho officially consists of two local areas under WIOA – East Central Idaho, also known as Service Delivery Area 6 or Region 6, and the Balance of State, consisting of Regions 1-5. The Workforce Development Council, as the WIOA State Board, provides the policies to the local areas and the Council, acting as the local board for the two areas, is also responsible for implementing these requirements. In compliance with WIOA Sec. 121(b)(1)(A), 20 CFR 678.420, and 678.510, detailed One-Stop partner roles and resource contributions are outlined in the MOUs for each local area of the state with a Comprehensive One-Stop Center and may be found here:

- [North Central Idaho](#)
- [Eastern Idaho](#)

In accordance with the [Statewide Idaho One-Stop/American Job Center Network MOU](#), Idaho One-Stop partners will be responsible to provide available career services in a non-discriminatory and universally accessible manner, provide referrals to system partners, serve populations with multiple barriers to employment, support the cross training of partner agency staff to ensure familiarity with and representation of all programs, participate as a member of the WIOA Advisory Group, and share in the equitable and proportionate share of their respective American Job Center operational costs that benefit their program(s) participants.

(5) *The competitive process used to award the subgrants and contracts for title I activities.*

In Idaho, the state Workforce Development Council also operates as the local workforce board for the state as allowed by waiver in the approved 2022-2023 WIOA Combined State Plan (modification) and authorized in WIOA Sec. 107(c)(4). Thusly, the Workforce Development Council is responsible for the selection of Title I-B providers, including the competitive procurement of the One-Stop Operator. The Workforce Development Council adopted a [policy](#) on the selection of service providers on April 11, 2019.

As a state entity, the Workforce Development Council must follow state procurement policy as authorized by the Uniform Guidelines under 2 CFR 200.320. The State Procurement Act in Idaho Code Title 67, Chapter 92 charges the Administrator of the Division of Purchasing with acquiring all property for state agencies and overseeing all solicitations. Solicitations are required to be competitive, except as otherwise provided by statute or rule.

(6) *How training services outlined in section 134 will be provided through individual training accounts and/or through contracts, and how such training approaches will be coordinated. Describe how the State will meet informed customer choice requirements regardless of training approach.*

Idaho Title I-B programs offer training opportunities to eligible participants in the Adult, Dislocated Worker, and Youth programs, using both Individual Training Accounts (ITAs) and contracts with employers to provide on-the-

job training. The State provides detailed technical assistance guides to local service providers referring participants to training.

Because of its small population and rural nature, the Governor does not maintain a list of On-the-Job training (OJT) providers. Rather, on-the-job training is generally approached as job development negotiated with an employer for eligible participants. A copy of Idaho's Technical Assistance Guide which provides WIOA Title I-B staff direction on the implementation of OJT opportunities is located here – [Section 9: Occupation Skills Training/OJT](#).

Idaho maintains an extensive [Eligible Training Provider List](#) to ensure consumer choice for occupational skills training is provided for all areas of the state. The state's technical colleges, proprietary schools, and Registered Apprenticeship sponsors/employers regularly submit new programs to add to the list, especially those programs which align eligible training to in-demand occupations in Idaho's high-demand industry sectors. Although the state has encountered difficulty in the past collecting performance data from the training providers, it has overcome the obstacles preventing this collection from taking place and recently submitted the required PY22 ETP reporting data.

WIOA Title I-B program staff provide assistance to program participants navigating the available training options by reviewing the local or market demand for the occupational skills, and costs of training. The state's WIOA Technical Assistance Guide (cited earlier) contains information regarding occupational skills training and how program staff may provide this service to participants who may show the need for this benefit.

(7) How the State Board, in fulfilling Local Board functions, will coordinate title I activities with those activities under title II. Describe how the State Board will carry out the review of local applications submitted under title II consistent with WIOA secs. 107(d)(11)(A) and (B)(i) and WIOA sec. 232.

The state Workforce Development Council (Idaho's WIOA state board), through its One-Stop Committee, ensures that activities and services are coordinated with Title I and Title II, as well as the other One-Stop partners.

The Council will carry out a review of local applications submitted under Title II in the spring of 2024 for the upcoming FY2025. The Board received a presentation about the description of the process, including the timeline, and the Board chair appointed an ad hoc committee to conduct the review. With this coming year's funding cycle (FY2025) for Title II services, the Council will again be included as it participates in the review of this year's applications.

(8) Copies of executed cooperative agreements which define how all local service providers will carry out the requirements for integration of and access to the entire set of services available in the One-Stop delivery system, including cooperative agreements with entities administering Rehabilitation Act programs and services.

All the State-level One-Stop Partners, including the entities administering Rehabilitation Act programs and services, developed a statewide Memorandum of Understanding for the Idaho American Job Center Network. This document sets the standard for how service delivery is provided and integrated throughout the entire state. The executed MOU is located here – [Executed Idaho AJC Network MOU](#).

*(e) **Waiver Requests (optional)**. States wanting to request waivers as part of their title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:*

(1) Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;

The State of Idaho is formally seeking a waiver to permit a state board to carry out the functions of a local board. This waiver request is for a renewal of a waiver previously applied to 20 CFR 679.310(f) which states that a state board must carry out the roles of a local board when the State Plan indicates that the State will be treated as a local area under WIOA. The Workforce Innovation and Opportunity Act Sections 106(d)(2) and 107(c)(4) also direct a state board for a single state local area to carry out the functions of the local board. The Workforce Development Council has acted as both the state and local board under WIA since 2005, under WIOA since 2014, and the current structure is reflected in the Combined State Plan.

(2) Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;

No state or local policies limit the Governor's authority to require a regional plan or utilize the Workforce Development Council as the local workforce board for the state.

(3) Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;

The primary goal to be achieved by this waiver is to reduce annual overhead and maximize the available money directed to program services, especially training and work-based learning, and services to business. The programmatic outcome is to serve a larger number of participants than would otherwise be served due to added administrative costs. To maximize resources available for service delivery, the state continues to use the Workforce Development Council as the local workforce board throughout the state. When initially implemented, this saved the WIA program in the state approximately \$1.5 million dollars by removing the administrative overhead of maintaining six regions throughout the state. Since then, these former administrative funds have been utilized as WIOA program funds, allowing for more participants to be served.

As evidenced since its initial implementation, Idaho's single statewide planning structure has continued to reduce annual overhead, and maximizes the available funding directed to training and services to business and job seekers.

This statewide structure enhances efforts to transform the system into a demand driven system. The eight Idaho Department of Labor offices serve as the state's American Job Centers offering the full range of workforce development services, and dozens of mobile locations across the state expand access into rural areas to connect citizens far from the AJCs to workforce services. This recognizes the importance of sharing data and information about new and expanding businesses to build the economy across regions.

(4) Describes how the waiver will align with the Department's policy priorities, such as:

- (A) supporting employer engagement;*
- (B) connecting education and training strategies;*
- (C) supporting work-based learning;*
- (D) improving job and career results, and*
- (E) other guidance issued by the Department.*

The Workforce Development Council structure has been in place since the Jobs Training Partnership Act. Its current membership aligns with the prescribed composition under WIOA, including a majority of business representatives, along with partners from government, labor, community-based and educational entities. State education policy is thoroughly aligned with the state's workforce development goals.

(5) Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and

This waiver allowing a single statewide regional planning structure has allowed for an average annual increase in training opportunities for more adults, dislocated workers and at-risk youth, and has helped the state to maintain service levels despite funding cuts over the years.

(6) Describes the processes used to:

- (A) Monitor the progress in implementing the waiver;*
- (B) Provide notice to any local board affected by the waiver;*
- (C) Provide any local board affected by the waiver an opportunity to comment on the request;*
- (D) Ensure meaningful public comment, including comment by business and organized labor, on the waiver.*
- (E) Collect and report information about waiver outcomes in the State's WIOA Annual Report.*

As evidenced since its initial implementation, the single statewide planning structure has reduced annual overhead, maximizing the available money directed towards program services, including training/work-based learning, and services to business and job seekers. In the spirit of WIOA's intent, the State has emphasized spending program funds towards those individuals most in need and who can benefit from intensive staff intervention, and direct training and support of businesses and participants, all of which positively impact the achievement of performance goals.

The single statewide structure has strengthened administrative oversight and accountability processes. Prior to this change, administrative deficiencies resulted in substantial disallowed costs for Idaho's largest Workforce

Investment Area. The strengthened administrative structure under the waiver has assisted Idaho to minimize disallowed costs, further enabling the redirection of funds from service provider and administration to direct participant training and support.

As noted earlier in this section of Idaho's Combined State Plan, Idaho is comprised of two local areas – the Balance of State and eastern Idaho – a structure established since 2005. Under this waiver, the state Workforce Development Council serves as a statewide local board for both local areas, functioning as the planning structure outlined earlier. Prior to submission of this plan modification and previous versions, the state and the council reached out to the East Central Idaho Elected Official Consortium and its WIOA representatives, East Central Idaho Planning and Development Association, dba ALTURA, to discuss any potential changes to this structure and/or affirm the existing relationship. Since the structure's establishment, ALTURA and those it represents have unanimously supported this waiver and its objectives. The MOU between ALTURA and the Workforce Development Council outlines the roles each have in the statewide and local governance of Idaho's workforce development system.

In addition, the Workforce Development Council itself includes several elected officials as part of its membership. Two serve as local elected officials, and two others are state representatives – one representing state House and the other the state Senate. Each member represents a different area of the state and bring a local perspective to the issues affecting workforce matters across the state. Currently, the local elected official representing cities is from the eastern Idaho local area.

Funds to the local areas are distributed based on the state's [WIOA Title I-B Formula Funds Distribution Policy](#), which outlines how the state allots funds to each local area.

Idaho's waiver request was posted on the Idaho Workforce Development Council's website for comment and review by required parties and the public. An invitation was personally extended to two influential organizations in the state – the Idaho Association of Cities and Idaho Association of Counties - to provide them the opportunity to review not only this waiver, but the entire Combined State plan. No local boards are affected by the waiver. A copy of this waiver request was provided to all members of the state Workforce Development Council, along with the Idaho's PY2024-2027 WIOA Combined State Plan. The State Workforce Development Council will have reviewed the request for submission of a waiver along with the state plan during its March 6, 2024, meeting. The meeting was announced and opened to the public via a variety of means across the state.

If the state receives any public comments, they will be forwarded to U.S.DOL and included as a modification to Idaho's Combined State Plan. The impact of this waiver on the state's performance will be addressed in the state's WIOA Annual Report.

(7) *The most recent data available regarding the results and outcomes observed through implementation of the existing waiver, in cases where the State seeks renewal of a previously approved waiver.*

Not applicable.

TITLE I-B ASSURANCES

The State Plan must include assurances that:	
1.	The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;
	YES
2.	The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;
	YES
3.	The State has established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;
	YES
4.	The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);
	YES
5.	Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;
	NA
6.	The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;
	YES
7.	The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);
	YES
8.	The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;
	YES

9.	If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;
	YES
10.	The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.
	YES
11.	The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);
	YES